

EPA Reg. No. 83923-13

83923-2 → Computer

See 432-A83
Labeling (no pollinator
box)

*verified it is
identical on 6/10/15

@ 8:05 AM

G.B.

IDENTICAL
83923-2
dated 10/23/06



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

83923-13

Date of Issuance:

9/2/15

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Bithor XT

Name and Address of Registrant (include ZIP Code):

Ensystex IV, Inc.
c/o
Leanne Pruett
Pyxis Regulatory Consulting, Inc.
4110 136th St., NW
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Venus Eagle, Product Manager 01
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Date:

9/2/15

2. You are required to comply with the data requirements described in the DCI and EDSP orders identified below:
 - a. Imidacloprid GDCI-129099-951
 - b. Bifenthrin GDCI-128825-902; GDCI-128825-1158; GDCI-128825-902; GDCI-128825-1114
 - c. Imidacloprid EDSP-129099
 - d. Bifenthrin EDSP-128825

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCIs or EDSP order listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:
http://www.epa.gov/oppsrrd1/contacts_prd.htm

3. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, “EPA Reg. No. 83923-13.”
4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 04/16/2015

If you have any questions, please contact Gene Benbow by phone at 703-347-0235, or via email at Benbow.Gene@epa.gov.

Enclosure



BITHOR XT

For control of listed pests indoors and outdoors within a 10-foot perimeter of the structure, in residential, commercial, industrial, institutional and public structures and buildings. For control of wood-infesting pests.

Active Ingredient:	By Wt.
Imidacloprid	5.0%
Bifenthrin*	4.0%
Other Ingredients:	91.0%
TOTAL:	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum

Contains 0.45 pounds of imidacloprid and 0.36 pounds of bifenthrin per gallon

EPA Reg. No. 83923- EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (866-367-8467) or visit www.for-thor.com.

NET CONTENTS: Gallon(s)

Manufactured by:

ENSYSTEX IV, Inc.

2175 Village Drive, Fayetteville, NC 28304

FIRST AID

If swallowed	Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything to an unconscious person.
If on skin or clothing	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice
If in eyes	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-369-4352 for emergency medical treatment information.

NOTE TO PHYSICIAN

Note To Physician: No specific antidote is available. Treat the patient symptomatically. This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt, long pants, shoes and socks and waterproof gloves. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ACCEPTED

Sep 02, 2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 83923-13

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas.

This product contains a chemical with properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when heavy rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies and drainage systems.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging in the treatment area.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

RESTRICTIONS

- Do not allow people or pets on treated surfaces until the spray has dried.
- Do not water the treated areas to the point of run-off.
- Do not make applications during rain.
- Do not make applications directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.
- Do not use household utensils to measure BITHOR XT.
- For broadcast applications, do not apply more than 4.5 pints (0.25 lb imidacloprid, 0.2 lb bifenthrin) per acre or 1.65 fluid ounces per 1000 square feet per application. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.4 lb bifenthrin) per acre per year or 3.3 fluid ounces per 1000 square feet per year.
- Outdoor applications must only be made within a 10-foot perimeter of the structure.
- Do not allow this product to contact plants in bloom if bees are foraging the area
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon
- Do not apply within aircraft cabins.
- Do not apply in food/feed areas of food and feed handling establishments.
- Do not apply to furniture or upholstery where prolonged contact with humans will occur.
- Do not spray bed linens, mattresses, blankets or pillows. Do not apply to materials which come in direct contact with occupants of the bed.
- Remove or cover and disconnect aquariums during application.
- Do not apply a broadcast application to interior surfaces of living areas.
- Do not apply directly to pets, crops, sources of electricity or firewood.
- During any application to overhead areas of structure, cover surfaces below with plastic sheeting or similar material, except for soil surfaces in crawlspaces.
- Wear protective clothing, unvented goggles, gloves and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A when making an overhead application or when applying in poorly ventilated indoor areas.
- Do not allow dripping or runoff to occur during indoor applications.
- For indoor uses apply only as a spot, crack or crevice treatment. Do not apply as a space spray.
- Do not allow spray to contact food, foodstuffs, food contacting surfaces, food utensils or water supplies.
- Thoroughly wash dishes and food handling utensils with soap and water if they become contaminated by application of this product.
- Do not apply this product in nursing home or patient rooms or in any rooms while occupied by the elderly or infirmed.
- Do not apply in classrooms when they are in use.
- Do not apply when occupants are present in the immediate area in institutions such as health care facilities, libraries, schools, offices, etc.
- Do not apply in livestock buildings such as barns.
- Do not apply where electrical short circuits can occur.
- Do not allow runoff or puddling of irrigation water following application.
- Do not apply by air.
- Do not apply by any type of irrigation system.

Additional Application Restrictions for Residential Outdoor Surface and Space Sprays:

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- (1) Applications to soil, turf or other non-flowering ground cover within a 10-foot perimeter around the structure;
- (2) Applications to the side of a building, up to a maximum height of 3 feet above grade;
- (3) Applications to underside of eaves, soffits, doors or windows permanently protected from rainfall by a covering, overhang, awning or other structure;
- (4) Applications around potential pest entry points into buildings, when limited to a surface band not to exceed one inch width;
- (5) Applications made through the use of a coarse, low pressure spray to only those portions of surfaces that are directly above bare soil, lawn, turf, mulch or other vegetation, as listed on this label, and not over an impervious surface, drainage or other conditions that could result in runoff into storm drains, drainage ditches, gutters, or surface waters, in order to control occasional invaders or aggregating pests.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, windows, door and eaves are limited to spot and crack-and-crevice applications only.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If container is leaking or if material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides below. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. Refer to *Precautionary Statements* on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact ENSYSTEX IV for decontamination procedures or any other assistance that may be necessary at 1-866-367-8467 or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

PRODUCT INFORMATION

BITHOR XT controls or suppresses listed insects and mites in, at and/or within a 10-foot perimeter of residential dwellings (single and multi-family), office, commercial, shopping and institutional buildings and complexes, and interior plantscapes. BITHOR XT mixes readily with water and other aqueous carriers.

Some insects can develop resistance to products used repeatedly for their control. Because the development of resistance by an insect to an insecticide cannot be predicted, the use of this product should be according to established resistance management strategies. Consult your local or state pest management authorities for details.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to

determine appropriate application timing and cultural practices to control different types of pests.

PESTS INSIDE AND OUTSIDE OF STRUCTURES

(OTHER THAN WOOD INFESTING INSECTS)

Bithor XT controls listed nuisance pests inside and outside of structures and modes of transport. Bithor XT may only be applied in and within a 10-foot perimeter around any type of residential or commercial structure, building or mode of transport: non-food/non-feed areas of food/feed handling establishments. Permitted application sites include the interior and exterior of homes, apartments, commercial buildings, manufacturing establishments, office buildings, stores, food processing plants (non-food/non-feed areas), warehouses, schools, factories, hospitals, nursing homes, mobile and modular homes, vehicles and marine vessels.

Bithor XT will not stain or damage any surface that water alone will not stain or damage.

Restrictions:

- Do not apply within aircraft cabins.
- Do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.
- Outdoor applications must only be made within a 10-foot perimeter of the structure.

Dilution of Bithor XT

Use rates for Bithor XT are expressed and mixed according to the percentage (%) concentration solution it forms when mixed in water as found in the table below.

Mixing Table for Bithor XT Inside and Outside of Structures			
Use Rate	% Bithor XT in water	Fluid ounces Bithor XT to add per gallon of water for desired %	Milliliters of Bithor XT to add per gallon of water for desired %
A	0.068%	0.89	26
B	0.135%	1.78	52

PESTS OUTSIDE AND AROUND STRUCTURES

Pests Controlled

Ants (including Carpenter Ant), Armyworms, Biting Flies, Blue or Green Bottle Fly, Boxelder Bug, Carpenter Bees, Centipedes, Chiggers, Chinch Bug, Clover Mites, Cluster Flies, Cockroaches, Crickets, Cutworms, Dichondra Flea Beetle, Earwigs, Elm Leaf Beetle, Firebrats, Fleas, Flesh Flies, Flies, Gnats, Grasshoppers, Ground Beetle, Hornets, Housefly, Japanese Beetle, Lady Beetles, Midges, Millipedes, Mole Crickets, Mosquitoes, Moths, Pillbugs, Scorpions, Silverfish, Sod Webworms, Sowbugs, Spider Mites, Spiders, Springtails, Stable Flies, Ticks, Wasps and Yellow Jackets.

Application Methods

Apply Bithor XT as a solution in the form of a general surface, spot, crack and crevice, void, pinstream or coarse spray to the structure or in a 10 foot perimeter of the structure where pests can enter the structure or where they have been seen or found or can find shelter. Bithor XT may also be applied with a paintbrush.

Bithor XT may be converted to foam and used to treat structural voids. First form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

When treating overhead, wear safety glasses, goggles or face shield and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A.

Restrictions:

- Do not contact treated surfaces until they are dry.
- Do not apply as a space spray.
- Do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.
- Do not treat firewood.
- Outdoor applications must only be made within a 10-foot perimeter of the structure.

Application Use Rates and Volumes

Select a Use Rate from the Bithor XT Mixing Table above. Use the 0.135% rate for severe infestations, faster knockdown or longer residual and for Fire Ants, Hornets, Wasps and Yellow Jackets.

Apply at a high enough volume to adequately wet the treated area without excessive dripping or runoff. Higher application volumes may be used for severe infestations, faster knockdown or longer residual control.

Re-Application

Do not repeat treatments more often than once every 7-10 days. The best efficacy and longest residual control is achieved when the highest listed concentration is used.

Application Locations

Apply spray to the exterior surfaces of structures including porches, patios and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or holes) and to soil, turf or other nonflowering ground cover within a 10-foot perimeter of the structure where pests enter the structure, congregate, find shelter or have been seen.

Perimeter Band Treatment

To help prevent pest infestation of structures, create a treated zone or band on the structure, soil and non-flowering groundcover around the entire perimeter of a structure, not to exceed 10 feet beyond the structure. Apply solution to soil, turf or other non-flowering ground covering adjacent to the structure within a band beginning 6 to 10 feet from the exterior foundation of the structure that extends back to the structure and then continues 2 to 3 feet up the exterior surface of the structure from the ground. Application volume will depend upon the nature of the surface being treated.

Mulch areas, for example, require more volume and hard surface areas require less.

Control of Specific Pests Outdoors

Ants (Nuisance ants including Carpenter Ants)

Outdoors: To achieve the highest level of control, locate and directly treat ant nests. Apply solution to ant trails, around doors and windows and at points where ants can be expected to forage or congregate. Apply as a broadcast application to the soil or mulched ground cover in landscape plant beds. It is recommended that shrubbery and other vegetation directly touching the structure be trimmed away.

For Ant (including Fire Ant) Mounds: Treat mounds and area within a 2 foot radius of the center of the mound with 1-2 gallons of 0.135% solution. When mounds exceed 12 inches in size use the higher solution.

Wasps, Hornets, and Yellow Jackets: Always use the highest rate (0.135%). Make application directly to the nest. Spray to the point of saturation with a pinstream application. Spray as many insects as possible. Remove and destroy treated nests to prevent emergence of newly hatched insects.

Boxelder Bug and other Occasional Invaders: Apply a perimeter application directly to where insects have congregated at points of entry. It may be necessary to also treat trees.

Centipedes, Earwigs, Millipedes, Pillbugs, Sowbugs, Springtails: Thoroughly treat mulch areas. The reduction of moisture in mulch areas may also aid in control of these pests. For centipedes, use the 0.135 % solution.

House Flies and Cluster Flies: Spray surfaces where flies may rest. For Cluster Flies, treat in late summer or fall before flies begin looking for winter shelter.

Fleas and Ticks: Treat, using the 0.135% solution, likely harborage areas like along footpaths or lawns that fall within a 10 foot perimeter of the building or structure (Do not apply beyond a 10-foot perimeter around any building or structure). Begin treatments in the spring. Insects may be re-introduced by host animals in the surrounding area. Retreatment, not to exceed 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year may be necessary to achieve and maintain control during periods of high pest pressure.

Scorpions: Apply a band (or perimeter) treatment within 10 feet of the perimeter of a structure.

PESTS INSIDE STRUCTURES (OTHER THAN FOOD/FEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS) INCLUDING MODES OF TRANSPORT

Pests Controlled

Ants (including Carpenter Ants), Bedbug, Beetles (except wood infesting), Blue or Green Bottle Fly, Hide or Leather Beetle, Boxelder Bug, Carpet Beetles, Centipedes, Clothes Moth, Clover Mites, Cluster Fly, Cockroaches, Crickets, Dermestids, Earwigs, Elm leaf Beetle, Fleas, Firebrats, Flies, Gnats, Hornets, House fly, Lady Beetles, Midges, Millipedes, Mosquitoes, Moths,

Pillbugs, Scorpions, Sowbugs, Silverfish, Spiders, Springtails, Ticks, Wasps and Yellow Jackets

Application Preparation

When treating in home food preparation and storage areas, cover all food preparation surfaces and utensils prior to beginning treatment. Thoroughly wash surfaces or items that cannot be covered or removed after treatment and before use. Remove food that cannot be covered. Disconnect fish tanks aerators and remove tanks or securely cover before application occurs.

Restriction: Do not allow people and pets to touch treated surfaces until they have dried.

Application Use Rates

Use a 0.068% or 0.135% solution of Bithor XT. Use the higher rate for severe infestations, faster knockdown or longer residual.

Application Methods

Apply Bithor XT as a solution in the form of a spot, crack and crevice, void, pinstream or coarse spray. Bithor XT may also be applied with a paintbrush.

Bithor XT may be converted to foam and used to treat structural voids. First form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

When treating overhead, wear safety glasses, goggles or face shield and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A..

Restriction: For indoor uses apply only as a spot, crack or crevice treatment. Do not apply as a space spray.

Application Locations

Apply to and around any areas pests or their evidence is seen or found, could hide or rest or could enter the premises including cracks and crevices, behind and under cabinets and appliances, around doors, windows and eaves, in attics and storage areas and around pipes and under appliances. Spot treat floor or rugs beneath furniture, in closets, and storage areas. Do not treat an area larger than 3 feet x 3 feet.

Control of Specific Pests Indoors

Cockroaches, Crickets, Firebrats, Scorpions, Silverfish, Spiders, and Ticks: Apply wherever these pests may hide, enter the structure or congregate such as cracks and crevices, baseboards, water pipe openings, around doors and windows, behind and under cabinets and appliances and within storage and attic areas.

Bedbug: To aid in control, apply to cracks and crevices wherever evidence of bedbugs has been found including within empty dressers and closets, on bed frames and box springs and behind high and low wall moldings and wallpaper edges. Not for use as a sole control agent against bedbugs. If evidence of bedbugs is found on or in mattresses, use only products approved for application to this item. Do not apply more often than once every 7-10 days.

Restrictions:

- Do not spray bed linens, mattresses, blankets or pillows. Do not apply to materials which come in direct contact with occupants of the bed.
- Remove all clothes and other articles from dressers or closets before application within them.
- Do not apply to furniture or upholstery where prolonged contact with humans will occur.

Boxelder Bug, Centipedes, Earwigs, Beetles, Millipedes, Pillbugs, Sowbugs: Apply to points of pest entry into structure such as around windows and doors. Apply anywhere else pests may congregate or be located.

Wasps, Hornets, Yellow-Jackets: Always use the highest rate (0.135%) when treating wasps, hornets and yellow-jackets. Apply solution to hiding and breeding places, contacting as many insects as possible. Best results are achieved when application is made in the evening when insects are at rest and to avoid stings. Spray to the point of saturation. Spray as many insects as possible. Remove and destroy treated nests to prevent emergence of newly hatched insects.

Ants (Nuisance ants including Carpenter Ants) Indoors: To achieve the highest level of control, locate and directly treat ant nests and ant trails. Apply solution in areas infested by or expected to be infested by ants such as on walls, tile, baseboards, under cabinets and around pipes.

WOOD INFESTING PESTS

Bithor XT controls carpenter ants and carpenter bees in localized areas, including galleries and structure voids and wood surfaces (including wooden surfaces in crawl spaces, basements, attics, decks, siding). Bithor XT will not stain or damage any surface that water alone will not stain or damage.

Dilution of Bithor XT

Use rates for Bithor XT are expressed and mixed according to the percentage (%) concentration solution it forms when mixed in water as found in the table below.

Mixing Table for Bithor XT for use against Wood Infesting Pests			
Use Rate	% Bithor XT in water	Fluid ounces Bithor XT to add per gallon of water for desired %	Milliliters of Bithor XT to add per gallon of water for desired %
A	0.068%	0.89	26
B	0.135%	1.78	52

Depending on application methods indicated below, Bithor XT may be applied as a spray, mist, foam, or brushed onto surface to be treated. To convert to foam, first form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

Application Use Rates and Volumes: Select a Use Rate from the Bithor XT Mixing Table above. Use the 0.135% rate for severe infestations. Apply at a high enough volume to adequately wet the treated area without excessive dripping or runoff.

Re-Application: Retreat as needed to maintain protection, every 7 to 10 days as needed.

Application Locations: Apply spray to the exterior surfaces of structures where pests have been seen, found, or can find shelter. For treatment of wood infested or susceptible to infestation by wood infesting pests, apply where pests have been seen, found, or can find shelter.

Pests Controlled: carpenter ants, carpenter bees,

APPLICATION METHODS

Carpenter Ants

Homes and Other Structures: Apply Bithor XT solution as a spray or foam around windows, doors or other places where carpenter ants enter the structure. Apply Bithor XT as a spray or foam into cracks and crevices or as a spray, mist or foam into voids where ants or nests are present (it may be necessary to drill into inaccessible voids prior to application). Use enough solution to thoroughly cover affected area. Any vegetation touching the structure (such as shrubbery, bushes or tree branches) can offer a route of entry to ants which avoid treated surfaces, and should be removed or pruned away.

Wooden Structures: Wood to soil contact areas (within 10 feet of the structure): Apply Bithor XT to prevent or control existing infestations by carpenter ants. Locate and treat interior infested cavity, if possible by injecting a solution or foam using a treatment tool with splashback guard. Wood to soil contact areas (non-structural) can be treated with Bithor XT solution as a soil drench or by injection at intervals of 8 to 12 inches.

Tunneling in soil: Treatment (soil drench or injection at intervals of 8 to 12 inches) can also be made along the edges of hard surfaces (such as walls or driveways) if ants are tunneling beneath the surface. Any vegetation touching the structure (such as shrubbery, bushes or tree branches) can offer a route of entry to ants which avoid treated surfaces, and should be removed or pruned away.

Carpenter Bees:

In or On Wooden Structures: Using the 0.135% solution, apply Bithor XT as a spray, mist or foam into gallery entrance holes made by carpenter bees. Entrance holes can be plugged after treatment using small pieces of steel wool or similar material. To prevent nesting by adult carpenter bees, exterior wood surfaces can be treated with Bithor XT spray, mist, foam, or by brushing onto the surface.

Restrictions:

- Do not drill where electrical wiring, plumbing lines, etc. are located.
- Do not apply where electrical shock hazards exist.

- When treating overhead, wear safety glasses, goggles or face shield and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A..
- Drill holes in commonly occupied areas must be sealed after treatment.
- When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material.
- Do not allow contact with treated surfaces until sprays have dried
- Outdoor applications must only be made within 10 feet around the perimeter of the structure

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of ENSYSTEX IV, Inc., it is impossible for ENSYSTEX IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ENSYSTEX IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or ENSYSTEX IV, Inc., and buyer assumes the risk of any such use. No agent of ENSYSTEX IV, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

LIMITATIONS OF LIABILITY: To the extent permitted by law, ENSYSTEX IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE

EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

BITHOR is a registered trademark of ENSYSTEX IV, Inc.

EPA [approval date]

OK Ge e-

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BITHOR XT

For control of listed pests indoors and outdoors within a 10-foot perimeter of the structure, in residential, commercial, industrial, institutional and public structures and buildings. For control of wood-infesting pests.

Active Ingredient:	By Wt.
Imidacloprid	5.0%
Bifenthrin*	4.0%
Other Ingredients:	91.0%
TOTAL:	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum

Contains 0.45 pounds of imidacloprid and 0.36 pounds of bifenthrin per gallon

EPA Reg. No. 83923- EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (866-367-8467) or visit www.for-thor.com.

NET CONTENTS: Gallon(s)

Manufactured by:

ENSYSTEX IV, Inc.

2175 Village Drive, Fayetteville, NC 28304

FIRST AID

lowed

Call poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything to an unconscious person.

skin or
hing

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice

If in eyes

Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-369-4352 for emergency medical treatment information.

NOTE TO PHYSICIAN

Note To Physician: No specific antidote is available. Treat the patient symptomatically. This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt, long pants, shoes and socks and waterproof gloves. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas.

This product contains a chemical with properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when heavy rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies and drainage systems.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging in the treatment area.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

RESTRICTIONS

- Do not allow people or pets on treated surfaces until the spray has dried.
- Do not water the treated areas to the point of run-off.
- Do not make applications during rain.
- Do not make applications directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.
- Do not use household utensils to measure BITHOR XT.
- For broadcast applications, do not apply more than 4.5 pints (0.25 lb imidacloprid, 0.2 lb bifenthrin) per acre or 1.65 fluid ounces per 1000 square feet per application. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.4 lb bifenthrin) per acre per year or 3.3 fluid ounces per 1000 square feet per year.

- Outdoor applications must only be made within a 10-foot perimeter of the structure.
- Do not allow this product to contact plants in bloom if bees are foraging the area
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon
- Do not apply within aircraft cabins.
- Do not apply in food/feed areas of food and feed handling establishments.
- Do not apply to furniture or upholstery where prolonged contact with humans will occur.
- Do not spray bed linens, mattresses, blankets or pillows. Do not apply to materials which come in direct contact with occupants of the bed.
- Remove or cover and disconnect aquariums during application.
- Do not apply a broadcast application to interior surfaces of living areas.
- Do not apply directly to pets, crops, sources of electricity or firewood.
- During any application to overhead areas of structure, cover surfaces below with plastic sheeting or similar material, except for soil surfaces in crawlspaces.
- Wear protective clothing, unvented goggles, gloves and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A when making an overhead application or when applying in poorly ventilated indoor areas.
- Do not allow dripping or runoff to occur during indoor applications.
- For indoor uses apply only as a spot, crack or crevice treatment. Do not apply as a space spray.
- Do not allow spray to contact food, foodstuffs, food contacting surfaces, food utensils or water supplies.
- Thoroughly wash dishes and food handling utensils with soap and water if they become contaminated by application of this product.
- Do not apply this product in nursing home or patient rooms or in any rooms while occupied by the elderly or infirmed.
- Do not apply in classrooms when they are in use.
- Do not apply when occupants are present in the immediate area in institutions such as health care facilities, libraries, schools, offices, etc.
- Do not apply in livestock buildings such as barns.
- Do not apply where electrical short circuits can occur.
- Do not allow runoff or puddling of irrigation water following application.
- Do not apply by air.
- Do not apply by any type of irrigation system.

Additional Application Restrictions for Residential Outdoor Surface and Space Sprays:

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

(1) Applications to soil, turf or other non-flowering ground cover within a 10-foot perimeter around the structure;

(2) Applications to the side of a building, up to a maximum height of 3 feet above grade;

(3) Applications to underside of eaves, soffits, doors or windows permanently protected from rainfall by a covering, overhang, awning or other structure;

(4) Applications around potential pest entry points into buildings, when limited to a surface band not to exceed one inch width;

(5) Applications made through the use of a coarse, low pressure spray to only those portions of surfaces that are directly above bare soil, lawn, turf, mulch or other vegetation, as listed on this label, and not over an impervious surface, drainage or other conditions that could result in runoff into storm drains, drainage ditches, gutters, or surface waters, in order to control occasional invaders or aggregating pests.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, windows, door and eaves are limited to spot and crack-and-crevice applications only.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If container is leaking or if material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides below. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. Refer to *Precautionary Statements* on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact ENSYSTEX IV for decontamination procedures or any other assistance that may be necessary at 1-866-367-8467 or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

PRODUCT INFORMATION

BITHOR XT controls or suppresses listed insects and mites in, at and/or within a 10-foot perimeter of residential dwellings (single and multi-family), office, commercial, shopping and institutional buildings and complexes, interior plantscapes, and wood structures. BITHOR XT mixes readily with water and other aqueous carriers.

Some insects can develop resistance to products used repeatedly for their control. Because the development of resistance by an insect to an insecticide cannot be predicted, the use of this product should be according to established resistance management strategies. Consult your local or state pest management authorities for details.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to

determine appropriate application timing and cultural practices to control different types of pests.

PESTS INSIDE AND OUTSIDE OF STRUCTURES

(OTHER THAN WOOD INFESTING INSECTS)

Bithor XT controls listed nuisance pests inside and outside of structures and modes of transport. Bithor XT may only be applied in and within a 10-foot perimeter around any type of residential or commercial structure, building or mode of transport: non-food/non-feed areas of food/feed handling establishments. Permitted application sites include the interior and exterior of homes, apartments, commercial buildings, manufacturing establishments, office buildings, stores, food processing plants (non-food/non-feed areas), warehouses, schools, factories, hospitals, nursing homes, mobile and modular homes, vehicles and marine vessels.

Bithor XT will not stain or damage any surface that water alone will not stain or damage.

Restrictions:

- Do not apply within aircraft cabins.
- Do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.
- Outdoor applications must only be made within a 10-foot perimeter of the structure.

Dilution of Bithor XT

Use rates for Bithor XT are expressed and mixed according to the percentage (%) concentration solution it forms when mixed in water as found in the table below.

Mixing Table for Bithor XT Inside and Outside of Structures			
Use Rate	% Bithor XT in water	Fluid ounces Bithor XT to add per gallon of water for desired %	Milliliters of Bithor XT to add per gallon of water for desired %
A	0.068%	0.89	26
B	0.135%	1.78	52

PESTS OUTSIDE AND AROUND STRUCTURES

Pests Controlled

Ants (including Carpenter Ant), Armyworms, Biting Flies, Blue or Green Bottle Fly, Boxelder Bug, Carpenter Bees, Centipedes, Chiggers, Chinch Bug, Clover Mites, Cluster Flies, Cockroaches, Crickets, Cutworms, Dichondra Flea Beetle, Earwigs, Elm Leaf Beetle, Firebrats, Fleas, Flesh Flies, Flies, Gnats, Grasshoppers, Ground Beetle, Hornets, Housefly, Japanese Beetle, Lady Beetles, Midges, Millipedes, Mole Crickets, Mosquitoes, Moths, Pillbugs, Scorpions, Silverfish, Sod Webworms, Sowbugs, Spider Mites, Spiders, Springtails, Stable Flies, Ticks, Wasps and Yellow Jackets.

Application Methods

Apply Bithor XT as a solution in the form of a general surface, spot, crack and crevice, void, pinstream or coarse spray to the structure or in a 10 foot perimeter of the structure where pests can enter the structure or where they have been seen or found or can find shelter. Bithor XT may also be applied with a paintbrush.

Bithor XT may be converted to foam and used to treat structural voids. First form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

When treating overhead, wear safety glasses, goggles or face shield and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A.

Restrictions:

- Do not contact treated surfaces until they are dry.
- Do not apply as a space spray.
- Do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.
- Do not treat firewood.
- Outdoor applications must only be made within a 10-foot perimeter of the structure.

Application Use Rates and Volumes

Select a Use Rate from the Bithor XT Mixing Table above. Use the 0.135% rate for severe infestations, faster knockdown or longer residual and for Fire Ants, Hornets, Wasps and Yellow Jackets.

Apply at a high enough volume to adequately wet the treated area without excessive dripping or runoff. Higher application volumes may be used for severe infestations, faster knockdown or longer residual control.

Re-Application

Do not repeat treatments more often than once every 7-10 days. The best efficacy and longest residual control is achieved when the highest listed concentration is used.

Application Locations

Apply spray to the exterior surfaces of structures including porches, patios and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or holes) and to soil, turf or other nonflowering ground cover within a 10-foot perimeter of the structure where pests enter the structure, congregate, find shelter or have been seen.

Perimeter Band Treatment

To help prevent pest infestation of structures, create a treated zone or band on the structure, soil and non-flowering groundcover around the entire perimeter of a structure, not to exceed 10 feet beyond the structure. Apply solution to soil, turf or other non-flowering ground covering adjacent to the structure within a band beginning 6 to 10 feet from the exterior foundation of the structure that extends back to the structure and then continues 2 to 3 feet up the exterior surface of the structure from the ground. Application volume will depend upon the nature of the surface being treated.

Mulch areas, for example, require more volume and hard surface areas require less.

Control of Specific Pests Outdoors

Ants (Nuisance ants including Carpenter Ants)

Outdoors: To achieve the highest level of control, locate and directly treat ant nests. Apply solution to ant trails, around doors and windows and at points where ants can be expected to forage or congregate. Apply as a broadcast application to the soil or mulched ground cover in landscape plant beds. It is recommended that shrubbery and other vegetation directly touching the structure be trimmed away.

For Ant (including Fire Ant) Mounds: Treat mounds and area within a 2 foot radius of the center of the mound with 1-2 gallons of 0.135% solution. When mounds exceed 12 inches in size use the higher solution.

Wasps, Hornets, and Yellow Jackets: Always use the highest rate (0.135%). Make application directly to the nest. Spray to the point of saturation with a pinstream application. Spray as many insects as possible. Remove and destroy treated nests to prevent emergence of newly hatched insects.

Boxelder Bug and other Occasional Invaders: Apply a perimeter application directly to where insects have congregated at points of entry. It may be necessary to also treat trees.

Centipedes, Earwigs, Millipedes, Pillbugs, Sowbugs, Springtails: Thoroughly treat mulch areas. The reduction of moisture in mulch areas may also aid in control of these pests.

House Flies and Cluster Flies: Spray surfaces where flies may rest. For Cluster Flies, treat in late summer or fall before flies begin looking for winter shelter.

Fleas and Ticks: Treat likely harborage areas like along footpaths or lawns that fall within a 10-foot perimeter of the building or structure (Do not apply beyond a 10-foot perimeter around any building or structure). Begin treatments in the spring. Insects may be re-introduced by host animals in the surrounding area. Retreatment, not to exceed 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year may be necessary to achieve and maintain control during periods of high pest pressure.

Scorpions: Treat around firewood, (but not firewood) and other hiding places. Remove piles of material that may serve as hiding places. [Apply a perimeter treatment.

PESTS INSIDE STRUCTURES (OTHER THAN FOOD/FEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS) INCLUDING MODES OF TRANSPORT

Pests Controlled

Ants (including Carpenter Ants), Bedbug, Beetles (except wood infesting), Blue or Green Bottle Fly, Hide or Leather Beetle, Boxelder Bug, Carpet Beetles, Centipedes, Clothes Moth, Clover Mites, Cluster Fly, Cockroaches, Crickets, Dermestids, Earwigs, Elm leaf Beetle, Fleas, Firebrats, Flies, Gnats, Hornets, House fly, Lady Beetles, Midges, Millipedes, Mosquitoes, Moths,

Pillbugs, Scorpions, Sowbugs, Silverfish, Spiders, Springtails, Ticks, Wasps and Yellow Jackets

Application Preparation

When treating in home food preparation and storage areas, cover all food preparation surfaces and utensils prior to beginning treatment. Thoroughly wash surfaces or items that cannot be covered or removed after treatment and before use. Remove food that cannot be covered. Disconnect fish tanks aerators and remove tanks or securely cover before application occurs.

Restriction: Do not allow people and pets to touch treated surfaces until they have dried.

Application Use Rates

Use a 0.068% or 0.135% solution of Bithor XT. Use the higher rate for severe infestations, faster knockdown or longer residual.

Application Methods

Apply Bithor XT as a solution in the form of a spot, crack and crevice, void, pinstream or coarse spray. Bithor XT may also be applied with a paintbrush.

Bithor XT may be converted to foam and used to treat structural voids. First form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

When treating overhead, wear safety glasses, goggles or face shield and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A.

Restriction: For indoor uses apply only as a spot, crack or crevice treatment. Do not apply as a space spray.

Application Locations

Apply to and around any areas pests or their evidence is seen or found, could hide or rest or could enter the premises including cracks and crevices, behind and under cabinets and appliances, around doors, windows and eaves, in attics and storage areas and around pipes and under appliances. Spot treat floor or rugs beneath furniture, in closets, and storage areas. Do not treat an area larger than 3 feet x 3 feet.

Control of Specific Pests Indoors

Cockroaches, Crickets, Firebrats, Scorpions, Silverfish, Spiders, and Ticks: Apply wherever these pests may hide, enter the structure or congregate such as cracks and crevices, baseboards, water pipe openings, around doors and windows, behind and under cabinets and appliances and within storage and attic areas.

Bedbug: To aid in control, apply to cracks and crevices wherever evidence of bedbugs has been found including within empty dressers and closets, on bed frames and box springs and behind high and low wall moldings and wallpaper edges. Not for use as a sole control agent against bedbugs. If evidence of bedbugs is found on or in mattresses, use only products approved for application to this item. Do not apply more often than once every 7-10 days.

Restrictions:

- Do not spray bed linens, mattresses, blankets or pillows.
- Do not apply to materials which come in direct contact with occupants of the bed.
- Remove all clothes and other articles from dressers or closets before application within them.
- Do not apply to furniture or upholstery where prolonged contact with humans will occur.

Boxelder Bug, Centipedes, Earwigs, Beetles, Millipedes, Pillbugs, Sowbugs: Apply to points of pest entry into structure such as around windows and doors. Apply anywhere else pests may congregate or be located.

Wasps, Hornets, Yellow-Jackets: Always use the highest rate (0.135%) when treating wasps, hornets and yellow-jackets. Apply solution to hiding and breeding places, contacting as many insects as possible. Best results are achieved when application is made in the evening when insects are at rest and to avoid stings. Spray to the point of saturation. Spray as many insects as possible. Remove and destroy treated nests to prevent emergence of newly hatched insects.

Ants (Nuisance ants including Carpenter Ants)

Indoors: To achieve the highest level of control, locate and directly treat ant nests and ant trails. Apply solution in areas infested by or expected to be infested by ants such as on walls, tile, baseboards, under cabinets and around pipes.

WOOD INFESTING PESTS

Bithor XT controls carpenter ants and carpenter bees in localized areas, including galleries and structure voids and wood surfaces (including wooden surfaces in crawl spaces, basements, attics, decks, fencing, siding). Bithor XT also protects firewood and other stored wood products from carpenter ants.

Bithor XT will not stain or damage any surface that water alone will not stain or damage.

Dilution of Bithor XT

Use rates for Bithor XT are expressed and mixed according to the percentage (%) concentration solution it forms when mixed in water as found in the table below.

Mixing Table for Bithor XT for use against Wood Infesting Pests			
Use Rate	% Bithor XT in water	Fluid ounces Bithor XT to add per gallon of water for desired %	Milliliters of Bithor XT to add per gallon of water for desired %
A	0.068%	0.89	26
B	0.135%	1.78	52

Depending on application methods indicated below, Bithor XT may be applied as a spray, mist, foam, or brushed onto surface to be treated. To convert to foam, first form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add

required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

Application Use Rates and Volumes: Select a Use Rate from the Bithor XT Mixing Table above. Use the 0.135% rate for severe infestations. Apply at a high enough volume to adequately wet the treated area without excessive dripping or runoff.

Re-Application: Retreat as needed to maintain protection, every 7 to 10 days as needed.

Application Locations: Apply spray to the exterior surfaces of structures where pests have been seen, found, or can find shelter. For treatment of wood infested or susceptible to infestation by wood infesting pests, apply where pests have been seen, found, or can find shelter.

Pests Controlled: carpenter ants, carpenter bees,

APPLICATION METHODS

Carpenter Ants

Homes and Other Structures: Apply Bithor XT solution as a spray or foam around windows, doors or other places where carpenter ants enter the structure. Apply Bithor XT as a spray or foam into cracks and crevices or as a spray, mist or foam into voids where ants or nests are present (it may be necessary to drill into inaccessible voids prior to application). Use enough solution to thoroughly cover affected area. Any vegetation touching the structure (such as shrubbery, bushes or tree branches) can offer a route of entry to ants which avoid treated surfaces, and should be removed or pruned away.

Wooden Structures (fencing and decking material, utility poles, landscape timbers, trees, other non-structural wood-to-soil contacts): Apply Bithor XT to prevent or control existing infestations by carpenter ants. Locate and treat interior infested cavity, if possible by injecting a solution or foam using a treatment tool with splashback guard. Wood to soil contact areas (non-structural) can be treated with Bithor XT solution as a soil drench or by injection at intervals of 8 to 12 inches.

Tunneling in soil: Treatment (soil drench or injection at intervals of 8 to 12 inches) can also be made along the edges of hard surfaces (such as walls or driveways) if ants are tunneling beneath the surface. Any vegetation touching the structure (such as shrubbery, bushes or tree branches) can offer a route of entry to ants which avoid treated surfaces, and should be removed or pruned away.

Carpenter Bees:

In or On Wooden Structures: Apply Bithor XT as a spray, mist or foam into gallery entrance holes made by carpenter bees. Entrance holes can be plugged after treatment using small pieces of steel wool or similar material. To prevent nesting by adult carpenter bees, exterior wood surfaces can be treated with Bithor XT spray, mist, foam, or by brushing onto the surface.

Restrictions:

- Do not drill where electrical wiring, plumbing lines, etc. are located.
- Do not apply where electrical shock hazards exist.
- When treating overhead, wear safety glasses, goggles or face shield and a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A.
- Drill holes in commonly occupied areas must be sealed after treatment.
- When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material.
- Do not allow contact with treated surfaces until sprays have dried

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LIMITATIONS OF LIABILITY: To the extent permitted by law, ENSYSTEX IV shall not be liable for any

incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

BITHOR is a registered trademark of ENSYSTEX IV, Inc.

EPA [approval date]

Benbow, Gene

From: Leanne Pruett <Leanne@PyxisRC.com>
Sent: Tuesday, August 25, 2015 2:37 PM
To: Benbow, Gene
Subject: RE: Venus final comments for 83923-RG
Attachments: 083923-xxxxx.20150825.Bithor XT Appl for Regn with EPA comments (3).pdf; 083923-xxxxx.20150825.Bithor XT Appl for Regn with EPA comments (3)-tracked.PDF

Hi, Gene –

Here are copies of the updated labeling – the ‘tracked’ version tracks all the changes that were made.

Best Regards,
Leanne

From: Benbow, Gene [mailto:Benbow.Gene@epa.gov]
Sent: Tuesday, August 18, 2015 3:40 PM
To: Leanne Pruett
Subject: Venus final comments for 83923-RG

Hi Leanne,

I have some final comments from Venus, and they’re really just things I didn’t think about when considering how to label this kind of product without the bee language. These are the last changes – I refuse to send any additional ones after this email.

1. On the front panel please delete “Wash thoroughly with soap.....before reuse” since it is basically repeated in the USER SAFETY RECOMMENDATIONS.
2. Please put the USER SAFETY RECOMMENDATIONS in a box for prominence.
3. On page 3 of 7 please delete “and wood structures” under PRODUCT INFORMATION. This could include fencing and trees (according to this same label further along) and would most certainly be beyond 10’ of a structure, which would trigger the bee language.
4. On page 4 of 7 please bullet the Restrictions under the PESTS INSIDE AND OUTSIDE OF STRUCTURES heading.
5. On page 5 of 7 under Centipedes, Earwigs, Millipedes, Pillbugs, Sowbugs, and Springtails please add the sentence “For centipedes using the 0.135% solution”. (Since these are a public health pest)
6. Also on page 5 of 7 add the same rate for Fleas and Ticks.
7. On page 5 of 7 under Scorpions please delete “Treat around firewood (but not firewood) and other hiding places. Remove piles of material that may serve as hiding places”. Add “apply a band (or perimeter) treatment within 10’ of the perimeter of a structure” like the other sections we did previously. Those other areas would be outside of 10’ of a structure, and no one would want to place firewood against said structure.
8. On page 6 of 7 under WOOD INFESTING PESTS please delete “Bithor XT also protects firewood and other stored wood products from carpenter ants” for the same reason.
9. On page 6 of 7 under Wooden Structures please delete “(fencing and decking material, utility poles, landscape timbers, trees, other non-structural wood to soil contacts”. Revise the text “Wood to soil contact areas (non-structural)” to read “Wood to soil contact areas (within 10’ of the structure)”.
10. On page 6 of 7 under Carpenter Bees please add the 0.135% rate since they’re public health pests.
11. On page 7 of 7 please add the “outdoor applications must only be made within 10’ around the perimeter of the structure” under the Restrictions bullets.

I know this is a long time coming – if it helps with your client, please relay to them that some of this is us trying to figure out how to craft label language around their request to avoid using the bee language. It’s taken a few sets of eyes to

read through some of this and try to figure out where these applications would actually be made, and whether it truly stays “around the structure”.

Thanks for your work Leanne,

Gene Benbow

Biologist, EPA

Invertebrate & Vertebrate Branch 3

Registration Division

<http://epa.gov/pesticides/>

703-347-0235

Benbow, Gene

From: Leanne Pruett <Leanne@PyxisRC.com>
Sent: Wednesday, August 12, 2015 11:11 AM
To: Benbow, Gene
Cc: Eagle, Venus
Subject: RE: 83923-RG
Attachments: 083923-xxxxx.20150730.Bithor XT Appl for Regn with EPA comments (2).pdf; 083923-xxxxx.20150730.Bithor XT Appl for Regn with EPA comments (2)-tracked.PDF

Hi, Gene –

Here is the updated labeling for the Bithor XT (tracked and clean versions).

Sorry it took me so long to get this back to you. I was on vacation at the end of July, and then the client was out of the office, so couldn't review it for a week or so.

Best Regards,
Leanne

From: Benbow, Gene [mailto:Benbow.Gene@epa.gov]
Sent: Thursday, July 16, 2015 7:06 AM
To: Leanne Pruett
Cc: Eagle, Venus
Subject: 83923-RG

Hi Leanne,

I have a few more comments for your label, one of which is somewhat confusing and I'm hoping we can resolve it.

1. On page 2 the language "wear protective clothing.....and respirator" for overhead applications must be coming from another me-too label, I'm assuming this one --
http://www3.epa.gov/pesticides/chem_search/ppls/081824-00005-20131105.pdf

"Respirator" means basically nothing though – and we've recently updated our PPE to match the post-1995 OSHA respirator requirements. Some of the respirators we have on labels no longer even exist (e.g. "dust/mist" respirators), and others mean something entirely different now (e.g. a TC-21C is now actually a very expensive PAPR unit).

What this means is we need to specify what is meant by "respirator". I suspect this came from HED at some point on one of these bug labels, and then hundreds of people did a me-too and there you go! I attached a couple of helpful files just in case you run into this kind of thing again – but it's also in the new LRM chapter as well.

So, please replace "respirator" with:

"A NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A."

Since oil-containing products may not use a "N" filter, I'm 99% sure the above language from the LRM is what applies to this label. This is pasted from the CDC website:

- If oil particles (e.g., lubricants, cutting fluids, glycerine, etc.) are present, use an R- or P-series filter. **Note:** N-series filters cannot be used if oil particles are present.

Okay, sorry for the long-winded explanation!

2. On page 3 in the PRODUCT INFORMATION section please add “within a 10’ perimeter of” instead of “around” before residential dwellings.
3. On page 3 in the same section please delete “grounds, parks, recreational areas, athletic fields, playgrounds, airports, cemeteries, lawns, and materials” since these would require the bee language.
4. On page 4 under PESTS INSIDE AND OUTSIDE OF STRUCTURES please revise “Bithor XT can be applied” to “may only be applied” there at the top.
5. On page 4 in the same section please add the 10’ restriction under the bold **Restriction** heading.
6. On page 4 under PESTS OUTSIDE AND AROUND STRUCTURES please add the 10’ restriction under the bold **Restrictions** heading.
7. On page 4 please replace “dust/mist respirator” with the same respirator language I listed above.
8. On page 4 under **Application Use Rates and Volumes** please delete the text “Bithor XT may be diluted to lower.....” since depending upon how you did this, you could end up applying a lower amount of chemical to public health pests and thus not achieve efficacy.
9. On page 4 under Perimeter Band Treatment please revise the first sentence to include the 10’ restriction, and also revise “vegetation” to “non-flowering groundcover”.
10. On page 5 under Fleas and Ticks please delete “footpaths or lawns” or revise with the 10’ restriction.
11. On page 6 under Firewood and Stored Wood Products please....well, delete that section since it falls outside of a perimeter treatment. I grew up in rural Missouri with a woodstove and no one stored firewood within 10’ of the structure unless you wanted termites (or to burn the house down).

Let me know if you have questions about this Leanne – I’m here all day today. I appreciate your patience with this.

Sincerely,

Gene Benbow
 Biologist, EPA
 Invertebrate & Vertebrate Branch 3
 Registration Division
<http://epa.gov/pesticides/>
 703-347-0235

New version

reg. ratio



BITHOR XT

For control of listed pests indoors and outdoors within a 10-foot perimeter of the structure, in residential, commercial, industrial, institutional and public structures and buildings. For control of wood-infesting pests.

Active Ingredient:	By Wt.
Imidacloprid	5.0%
Bifenthrin*	4.0%
Other Ingredients:	91.0%
TOTAL:	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum

Contains 0.45 pounds of imidacloprid and 0.36 pounds of bifenthrin per gallon

EPA Reg. No. 83923- EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (866-367-8467) or visit www.for-thor.com.

NET CONTENTS: Gallon(s)

Manufactured by:
ENSYSTEX IV, Inc.

2175 Village Drive, Fayetteville, NC 28304

FIRST AID

If swallowed	Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything to an unconscious person.
If on skin or clothing	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice
If in eyes	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-369-4352 for emergency medical treatment information.

NOTE TO PHYSICIAN

Note To Physician: No specific antidote is available. Treat the patient symptomatically. This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt, long pants, shoes and socks and waterproof gloves. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

D- ft and
some treated area

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas.

This product contains a chemical with properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when heavy rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies and drainage systems.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging in the treatment area.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

RESTRICTIONS

- Do not allow people or pets on treated surfaces until the spray has dried.
- Do not water the treated areas to the point of run-off.
- Do not make applications during rain.
- Do not make applications directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.
- Do not use household utensils to measure BITHOR XT.
- For broadcast applications, do not apply more than 4.5 pints (0.25 lb imidacloprid, 0.2 lb bifenthrin) per acre or 1.65 fluid ounces per 1000 square feet per application. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.4 lb bifenthrin) per acre per year or 3.3 fluid ounces per 1000 square feet per year.

- Outdoor applications must only be made within a 10-foot perimeter of the structure.
- Do not allow this product to contact plants in bloom if bees are foraging the area
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon
- Do not apply within aircraft cabins.
- Do not apply in food/feed areas of food and feed handling establishments.
- Do not apply to furniture or upholstery where prolonged contact with humans will occur.
- Do not spray bed linens, mattresses, blankets or pillows. Do not apply to materials which come in direct contact with occupants of the bed.
- Remove or cover and disconnect aquariums during application.
- Do not apply a broadcast application to interior surfaces of living areas.
- Do not apply directly to pets, crops, sources of electricity or firewood.
- During any application to overhead areas of structure, cover surfaces below with plastic sheeting or similar material, except for soil surfaces in crawlspaces.
- Wear protective clothing, unvented goggles, gloves and respirator when making an overhead application or when applying in poorly ventilated indoor areas.
- Do not allow dripping or runoff to occur during indoor applications.
- For indoor uses apply only as a spot, crack or crevice treatment. Do not apply as a space spray.
- Do not allow spray to contact food, foodstuffs, food contacting surfaces, food utensils or water supplies.
- Thoroughly wash dishes and food handling utensils with soap and water if they become contaminated by application of this product.
- Do not apply this product in nursing home or patient rooms or in any rooms while occupied by the elderly or infirmed.
- Do not apply in classrooms when they are in use.
- Do not apply when occupants are present in the immediate area in institutions such as health care facilities, libraries, schools, offices, etc.
- Do not apply in livestock buildings such as barns.
- Do not apply where electrical short circuits can occur.
- Do not allow runoff or puddling of irrigation water following application.
- Do not apply by air.
- Do not apply by any type of irrigation system.

Additional Application Restrictions for Residential Outdoor Surface and Space Sprays:

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- (1) Applications to soil, turf or other non-flowering ground cover within a 10-foot perimeter around the structure;

(2) Applications to the side of a building, up to a maximum height of 3 feet above grade;

(3) Applications to underside of eaves, soffits, doors or windows permanently protected from rainfall by a covering, overhang, awning or other structure;

(4) Applications around potential pest entry points into buildings, when limited to a surface band not to exceed one inch width;

(5) Applications made through the use of a coarse, low pressure spray to only those portions of surfaces that are directly above bare soil, lawn, turf, mulch or other vegetation, as listed on this label, and not over an impervious surface, drainage or other conditions that could result in runoff into storm drains, drainage ditches, gutters, or surface waters, in order to control occasional invaders or aggregating pests.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, windows, door and eaves are limited to spot and crack-and-crevice applications only.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If container is leaking or if material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides below. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. Refer to *Precautionary Statements* on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact ENSYSTEX IV for decontamination procedures or any other assistance that may be necessary at 1-866-367-8467 or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

PRODUCT INFORMATION

BITHOR XT controls or suppresses listed insects and mites in, at and/or around residential dwellings (single and multi-family), office, commercial, shopping and institutional buildings, and ~~complexes, grounds, parks, recreational areas, athletic fields, playgrounds, airports, cemeteries, lawns, interior plantscapes and wood structures and materials.~~ BITHOR XT mixes readily with water and other aqueous carriers.

Some insects can develop resistance to products used repeatedly for their control. Because the development of resistance by an insect to an insecticide cannot be predicted, the use of this product should be according to established resistance management strategies. Consult your local or state pest management authorities for details.

These areas
would require
the use of
language

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing and cultural practices to control different types of pests.

PESTS INSIDE AND OUTSIDE OF STRUCTURES

(OTHER THAN WOOD INFESTING INSECTS)

Bithor XT controls listed nuisance pests inside and outside of structures and modes of transport. Bithor XT can be applied in and within a 10-foot perimeter around any type of residential or commercial structure, building or mode of transport: non-food/non-feed areas of food/feed handling establishments. Permitted application sites include the interior and exterior of homes, apartments, commercial buildings, manufacturing establishments, office buildings, stores, food processing plants (non-food/non-feed areas), warehouses, schools, factories, hospitals, nursing homes, mobile and modular homes, vehicles and marine vessels.

Bithor XT will not stain or damage any surface that water alone will not stain or damage.

Restriction: Do not apply within aircraft cabins.

Do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.

Dilution of Bithor XT

Use rates for Bithor XT are expressed and mixed according to the percentage (%) concentration solution it forms when mixed in water as found in the table below.

Mixing Table for Bithor XT Inside and Outside of Structures			
Use Rate	% Bithor XT in water	Fluid ounces Bithor XT to add per gallon of water for desired %	Milliliters of Bithor XT to add per gallon of water for desired %
A	0.068%	0.89	26
B	0.135%	1.78	52

PESTS OUTSIDE AND AROUND STRUCTURES

Pests Controlled

Ants (including Carpenter Ant), Armyworms, Biting Flies, Blue or Green Bottle Fly, Boxelder Bug, Carpenter Bees, Centipedes, Chiggers, Chinch Bug, Clover Mites, Cluster Flies, Cockroaches, Crickets, Cutworms, Dichondra Flea Beetle, Earwigs, Elm Leaf Beetle, Firebrats, Fleas, Flesh Flies, Flies, Gnats, Grasshoppers, Ground Beetle, Hornets, Housefly, Japanese Beetle, Lady Beetles, Midges, Millipedes, Mole Crickets, Mosquitoes, Moths, Pillbugs, Scorpions, Silverfish, Sod Webworms, Sowbugs, Spider Mites, Spiders, Springtails, Stable Flies, Ticks, Wasps and Yellow Jackets.

Application Methods

Apply Bithor XT as a solution in the form of a general surface, spot, crack and crevice, void, pinstream or coarse spray to the structure or in a 10 foot perimeter of the structure where pests can enter the structure or

where they have been seen or found or can find shelter. Bithor XT may also be applied with a paintbrush.

Bithor XT may be converted to foam and used to treat structural voids. First form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

When treating overhead, wear safety glasses, goggles or face shield and a dust/mist respirator.

Restrictions:

Do not contact treated surfaces until they are dry.

Do not apply as a space spray.

Do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year.

Do not treat firewood.

Application Use Rates and Volumes

Select a Use Rate from the Bithor XT Mixing Table above. Use the 0.135% rate for severe infestations, faster knockdown or longer residual and for Fire Ants, Hornets, Wasps and Yellow Jackets.

Apply at a high enough volume to adequately wet the treated area without excessive dripping or runoff. Higher application volumes may be used for severe infestations, faster knockdown or longer residual control. For high volume applications Bithor XT may be diluted to lower concentrations by applying the same amount of Bithor XT in greater volumes of water.

Re-Application

Do not repeat treatments more often than once every 7-10 days. The best efficacy and longest residual control is achieved when the highest listed concentration is used.

Application Locations

Apply spray to the exterior surfaces of structures including porches, patios and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or holes) and to soil, turf or other nonflowering ground cover within a 10-foot perimeter of the structure where pests enter the structure, congregate, find shelter or have been seen.

Perimeter Band Treatment

To help prevent pest infestation of structures, create a treated zone or band on the structure, soil and vegetation around the entire perimeter of a structure.

Apply solution to soil, turf or other non-flowering ground covering adjacent to the structure within a band beginning 6 to 10 feet from the exterior foundation of the structure that extends back to the structure and then continues 2 to 3 feet up the exterior surface of the structure from the ground. Application volume will depend upon the nature of the surface being treated. Mulch areas, for example, require more volume and hard surface areas require less.

Control of Specific Pests Outdoors

Ants (Nuisance ants including Carpenter Ants)

Outdoors: To achieve the highest level of control, locate and directly treat ant nests. Apply solution to ant trails, around doors and windows and at points where ants can be expected to forage or congregate. Apply as

a broadcast application to the soil or mulched ground cover in landscape plant beds. It is recommended that shrubbery and other vegetation directly touching the structure be trimmed away.

For Ant (including Fire Ant) Mounds: Treat mounds and area within a 2 foot radius of the center of the mound with 1-2 gallons of 0.135% solution. When mounds exceed 12 inches in size use the higher solution.

Wasps, Hornets, and Yellow Jackets: Always use the highest rate (0.135%). Make application directly to the nest. Spray to the point of saturation with a pinstream application. Spray as many insects as possible. Remove and destroy treated nests to prevent emergence of newly hatched insects.

Boxelder Bug and other Occasional Invaders: Apply a perimeter application directly to where insects have congregated at points of entry. It may be necessary to also treat trees.

Centipedes, Earwigs, Millipedes, Pillbugs, Sowbugs, Springtails: Thoroughly treat mulch areas. The reduction of moisture in mulch areas may also aid in control of these pests.

House Flies and Cluster Flies: Spray surfaces where flies may rest. For Cluster Flies, treat in late summer or fall before flies begin looking for winter shelter.

Fleas and Ticks: Treat likely harborage areas like along footpaths or lawns. Begin treatments in the spring. Insects may be re-introduced by host animals in the surrounding area. Retreatment, not to exceed 9.0 pints (0.5 lb of imidacloprid and 0.4 lb of bifenthrin) per acre per year may be necessary to achieve and maintain control during periods of high pest pressure.

Scorpions: Treat around firewood (but not firewood) and other hiding places. Remove piles of material that may serve as hiding places. Apply a perimeter treatment.

PESTS INSIDE STRUCTURES (OTHER THAN FOOD/FEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS) INCLUDING MODES OF TRANSPORT

Pests Controlled

Ants (including Carpenter Ants), Bedbug, Beetles (except wood infesting), Blue or Green Bottle Fly, Hide or Leather Beetle, Boxelder Bug, Carpet Beetles, Centipedes, Clothes Moth, Clover Mites, Cluster Fly, Cockroaches, Crickets, Dermestids, Earwigs, Elm leaf Beetle, Fleas, Firebrats, Flies, Gnats, Hornets, House fly, Lady Beetles, Midges, Millipedes, Mosquitoes, Moths, Pillbugs, Scorpions, Sowbugs, Silverfish, Spiders, Springtails, Ticks, Wasps and Yellow Jackets

Application Preparation

When treating in home food preparation and storage areas, cover all food preparation surfaces and utensils prior to beginning treatment. Thoroughly wash surfaces or items that cannot be covered or removed after treatment and before use. Remove food that cannot be covered. Disconnect fish tanks aerators and remove tanks or securely cover before application occurs.

Restriction: Do not allow people and pets to touch treated surfaces until they have dried.

Application Use Rates

Use a 0.068% or 0.135% solution of Bithor XT. Use the higher rate for severe infestations, faster knockdown or longer residual.

Application Methods

Apply Bithor XT as a solution in the form of a spot, crack and crevice, void, pinstream or coarse spray. Bithor XT may also be applied with a paintbrush.

Bithor XT may be converted to foam and used to treat structural voids. First form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

When treating overhead, wear safety glasses, goggles or face shield and a dust/mist respirator.

Restriction: For indoor uses apply only as a spot, crack or crevice treatment. Do not apply as a space spray.

Application Locations

Apply to and around any areas pests or their evidence is seen or found, could hide or rest or could enter the premises including cracks and crevices, behind and under cabinets and appliances, around doors, windows and eaves, in attics and storage areas and around pipes and under appliances. Spot treat floor or rugs beneath furniture, in closets, and storage areas. Do not treat an area larger than 3 feet x 3 feet.

Control of Specific Pests Indoors

Cockroaches, Crickets, Firebrats, Scorpions, Silverfish, Spiders, and Ticks: Apply wherever these pests may hide, enter the structure or congregate such as cracks and crevices, baseboards, water pipe openings, around doors and windows, behind and under cabinets and appliances and within storage and attic areas.

Bedbug: To aid in control, apply to cracks and crevices wherever evidence of bedbugs has been found including within empty dressers and closets, on bed frames and box springs and behind high and low wall moldings and wallpaper edges. Not for use as a sole control agent against bedbugs. If evidence of bedbugs is found on or in mattresses, use only products approved for application to this item. Do not apply more often than once every 7-10 days.

Restrictions:

Do not spray bed linens, mattresses, blankets or pillows. Do not apply to materials which come in direct contact with occupants of the bed.

Remove all clothes and other articles from dressers or closets before application within them.

Do not apply to furniture or upholstery where prolonged contact with humans will occur.

Boxelder Bug, Centipedes, Earwigs, Beetles, Millipedes, Pillbugs, Sowbugs: Apply to points of pest entry into structure such as around windows and doors. Apply anywhere else pests may congregate or be located.

Wasps, Hornets, Yellow-Jackets: Always use the highest rate (0.135%) when treating wasps, hornets and yellow-jackets. Apply solution to hiding and breeding places, contacting as many insects as possible. Best results are achieved when application is made in the evening when insects are at rest and to avoid stings. Spray to the point of saturation. Spray as many insects as possible. Remove and destroy treated nests to prevent emergence of newly hatched insects.

Ants (Nuisance ants including Carpenter Ants)

Indoors: To achieve the highest level of control, locate and directly treat ant nests and ant trails. Apply solution in areas infested by or expected to be infested by ants such as on walls, tile, baseboards, under cabinets and around pipes.

WOOD INFESTING PESTS

Bithor XT controls carpenter ants and carpenter bees in localized areas, including galleries and structure voids and wood surfaces (including wooden surfaces in crawl spaces, basements, attics, decks, fencing, siding). Bithor XT also protects firewood and other stored wood products from carpenter ants.

Bithor XT will not stain or damage any surface that water alone will not stain or damage.

Dilution of Bithor XT

Use rates for Bithor XT are expressed and mixed according to the percentage (%) concentration solution it forms when mixed in water as found in the table below.

Mixing Table for Bithor XT for use against Wood Infesting Pests			
Use Rate	% Bithor XT in water	Fluid ounces Bithor XT to add per gallon of water for desired %	Milliliters of Bithor XT to add per gallon of water for desired %
A	0.068%	0.89	26
B	0.135%	1.78	52

Depending on application methods indicated below, Bithor XT may be applied as a spray, mist, foam, or brushed onto surface to be treated. To convert to foam, first form a solution of Bithor XT of the appropriate percentage concentration and volume. Then add required volume of a compatible foaming agent. Verify that the foaming agent is compatible with Bithor XT.

Application Use Rates and Volumes: Select a Use Rate from the Bithor XT Mixing Table above. Use the 0.135% rate for severe infestations. Apply at a high enough volume to adequately wet the treated area without excessive dripping or runoff.

Re-Application: Retreat as needed to maintain protection, every 7 to 10 days as needed.

Application Locations: Apply spray to the exterior surfaces of structures where pests have been seen, found, or can find shelter. For treatment of wood

infested or susceptible to infestation by wood infesting pests, apply where pests have been seen, found, or can find shelter.

Pests Controlled: carpenter ants, carpenter bees,

APPLICATION METHODS

Carpenter Ants

Homes and Other Structures: Apply Bithor XT solution as a spray or foam around windows, doors or other places where carpenter ants enter the structure. Apply Bithor XT as a spray or foam into cracks and crevices or as a spray, mist or foam into voids where ants or nests are present (it may be necessary to drill into inaccessible voids prior to application). Use enough solution to thoroughly cover affected area. Any vegetation touching the structure (such as shrubbery, bushes or tree branches) can offer a route of entry to ants which avoid treated surfaces, and should be removed or pruned away.

Wooden Structures (fencing and decking material, utility poles, landscape timbers, trees, other non-structural wood-to-soil contacts): Apply Bithor XT to prevent or control existing infestations by carpenter ants. Locate and treat interior infested cavity, if possible by injecting a solution or foam using a treatment tool with splashback guard. Wood to soil contact areas (non-structural) can be treated with Bithor XT solution as a soil drench or by injection at intervals of 8 to 12 inches.

Tunneling in soil: Treatment (soil drench or injection at intervals of 8 to 12 inches) can also be made along the edges of hard surfaces (such as walls or driveways) if ants are tunneling beneath the surface. Any vegetation touching the structure (such as shrubbery, bushes or tree branches) can offer a route of entry to ants which avoid treated surfaces, and should be removed or pruned away.

Firewood and Stored Wood Products: Treat soil prior to stacking firewood or other wood with 1 gallon of Bithor XT solution per 10 square feet of soil, to protect from carpenter ants and termites.

Carpenter Bees:

In or On Wooden Structures: Apply Bithor XT as a spray, mist or foam into gallery entrance holes made by carpenter bees. Entrance holes can be plugged after treatment using small pieces of steel wool or similar material. To prevent nesting by adult carpenter bees, exterior wood surfaces can be treated with Bithor XT spray, mist, foam, or by brushing onto the surface.

Restrictions:

- Do not drill where electrical wiring, plumbing lines, etc. are located.
- Do not apply where electrical shock hazards exist.
- When treating overhead, wear safety glasses, goggles or face shield and a dust/mist respirator.
- Drill holes in commonly occupied areas must be sealed after treatment.
- When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material.

- Do not allow contact with treated surfaces until sprays have dried

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of ENSYSTEX IV, Inc., it is impossible for ENSYSTEX IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ENSYSTEX IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or ENSYSTEX IV, Inc., and buyer assumes the risk of any such use. No agent of ENSYSTEX IV, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

LIMITATIONS OF LIABILITY: To the extent permitted by law, ENSYSTEX IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE

PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

BITHOR is a registered trademark of ENSYSTEX IV, Inc.

EPA [approval date]

ENSYSTEX IV, Inc.

2175 Village Dr., P. O. Box 87329, Fayetteville, NC 28304
Voice - 1-888-398-3772 Fax – 1-888-368-4749 www.ensystex.com

June 12, 2015

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex IV, Inc. (EPA Company Number 83923), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Ken Kendall

V.P Technical Services & Governmental Affairs

cc: Pyxis Regulatory Consulting, Inc.

Similarity Clinic Screen Completed

Date: 5/19/15

Jacket #: 83923-EG

Actions Done:

Acute Toxicity Review: COMPLETED

Acute Toxicity Language for Label: DONE

Product Chemistry Review: CITING - SENT TO
PC FOR REVIEW

Transfer This Jacket To:

PIM 01, VENUS EAGLE

RECEIVED IN SIMCLINIC ON 5/8/15

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

SIMILARITY CLINIC MEMORANDUM:

Subject: EPA Reg. No.: 83923-RG/Bithor XT
DP Barcode: 427273
PC Code: 129099 (imidacloprid), 128825 (bifenthrin)

From: Marianne Lewis, Biologist
Invertebrate Vertebrate Branch 3
Registration Division (7505P)

To: Venus Eagle, PM 01
Invertebrate Vertebrate Branch 3
Registration Division (7505P)

Applicant: Ensystex IV, Inc.
2175 Village Drive
Fayetteville, NC 28304

Handwritten:
il lita - 6215
5012
5/13/15

FORMULATION FROM EPA Reg. No. 83923-RG LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Imidacloprid:	5.0%
Bifenthrin:	4.0%
<u>Inert Ingredient(s):</u>	91.0%
Total	100.0%

BACKGROUND: The registrant is claiming substantial similarity to EPA Reg. No. 83923-2 and is citing specific MRID's to support the registration of their new product, EPA Reg. No. 83923-RG. The MRID's are as follows: 494849-01 (81-1), 494849-02 (81-2), 494849-03 (81-3), 494849-04 (81-4), 494849-05 (81-5), & 494849-06 (81-6). These studies were conducted on EPA Reg. No. 83923-2. The studies were reviewed and found to be acceptable by CITAB/RD on 12/9/14.

After comparing the CSFs from the subject product and the cited product, it has been determined that these products are substantially similar. The subject product will be assigned the following Toxicity Categories: acute oral (81-1) – III, acute dermal (81-2) – III, acute inhalation (81-3) – IV, primary eye irritation (81-4) – III, primary skin irritation (81-5) – IV, and will be classified as a non sensitizer.

RECOMMENDATIONS:

- The subject product will be assigned the Toxicity Categories listed above.
- The subject product will be classified as a non sensitizer.

The acute toxicity profile for EPA Reg. No. 83923-RG is currently:

Acute Oral	III	LD ₅₀ = 1098 mg/kg
Acute Dermal	III	
Acute Inhalation	IV	
Primary Eye	III	
Primary Dermal	IV	
Skin Sensitization	non sensitizer	

NOTE: The acute toxicity study requirements are satisfied for the subject product.

LABELING:

ID #: 083923-RG

BITHOR XT

CHILD RESISTANT PACKAGING REQUIRED:

Based on acute oral LD₅₀ is < 1500 mg/kg – residential use sites on label

SIGNAL WORD:

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material). *CAUTION*

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

21-Day Screen Completed by
Contractor

21-Day Expires on 5/11 - 15

Jacket # 83923-RG
MRID# _____

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

SHAUNTA HILL

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 4-20-15

Experts In-Processing Signature: B.B. Date 4-22-15 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>83923 - RG</u>		EPA Receipt Date: <u>4-20-15</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		X				
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5					X
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

* Documentation: PASS IFAZC

Shelene Reitor 4-23-15

Required forms are complete

* Insects: PASS IFAZC

- Insects approved for non-food use

* PRM 11-3: PASS IFAZC

no studies submitted

* Overall Status: PASS IFAZC

JR 5-4-15

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [Inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inert@epa.gov](#) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Unit of Inert Ingredient Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

R 300 and 301

100% identical (repack): YES or NO (circle one)

{If **yes**, it's a 100% repack - then product chemistry, acute toxicity and efficacy data are not required}

Data on Group A and B must be submitted - Group A and B can not be cited.

Guideline No.	Group A: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.1550	Product Identity & Composition	✓	
830.1600	Description of materials used to produce the product	✓	
830.1650	Description of formulation process	✓	
830.1670	Discussion on the formation of impurities	✓	
830.1700	Preliminary analysis	✓	
830.1750	Certified limits (158.345)	✓	
830.1800	Enforcement analytical method	✓	

Guideline No.	Group B: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.6302	Color	✓	
830.6303	Physical State	✓	
830.6304	Odor	✓	
830.6314	Oxidation/Reduction (Chemical incompatibility)	✓	
830.6315	Flammability	✓	
830.6316	Explodability	✓	
830.6317	Storage stability	✓	
830.6319	Miscibility	✓	
830.6320	Corrosion Characteristics	✓	
830.6321	Dielectric Breakdown voltage	✓	
830.7000	pH	✓	
830.7100	Viscosity	✓	
830.7300	Density	✓	

R 300 and 301

New products must provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cited	
		Yes	No
870.1100	Acute Oral (LD50)	✓	
870.1200	Acute Dermal (LD50)	✓	
870.1300	Acute Inhalation (LC50)	✓	
870.2400	Acute Eye Irritation	✓	
870.2500	Acute Dermal Irritation	✓	
870.2600	Dermal Sensitization	✓	

Efficacy – which guideline depends on the proposed label use and they must cite the data to be used for the bridging rationale.

Guideline No.	Efficacy Study Titles	Cited		Comments
		Yes	No	
810.3100	Soil Treatments for Imported Fire Ants	✓		
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments			N/A
810.3300	Treatments to Control Pests of Humans and Pets			N/A
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments	✓		
810.3500	Premises Treatments	✓		
810.3600	Structural Treatments	✓		
810.3800	Methods for Efficacy Testing of Termite Baits			N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 21, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-503581
EPA File Symbol or Registration Number: 83923-RG
Product Name: BITHOR XT
EPA Receipt Date: 20-Apr-2015
EPA Company Number: 83923
Company Name: ENSYSTECH IV, INC

LEANNE PRUETT
PYXIS REGULATORY CONSULTING, INC.
ENSYSTECH IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300
NEW PRODUCT;OR SIMILAR COMBINATION PRODUCT (ALREADY REGISTERED) TO AN IDENTICAL OR SUBSTANTIALLY SIMILAR IN COMPOSITION AND USE TO A REGISTERED
PRODUCT;REGISTERED SOURCE OF ACTIVE INGREDIENT;NO DATA REVIEW ON ACUTE TOXICITY, EFFICACY OR CRP - ONLY PRODUCT CHEMISTRY DATA;CITE-ALL DATA CITATION, OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA, OR APPLICANT SUBMITS SPECIFIC AUTHORIZATION LETTER FROM DATA OWNER;CATEGORY ALSO INCLUDES 100% RE-PACKAGE OF REGISTERED END-USE OR MANUFACTURING-USE PRODUCT THAT REQUIRES NO DATA SUBMISSION NOR DATA MATRIX;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 347-8961.

Sincerely,

Peresa Downs
Front End Processing Staff

Information Technology & Resources Management Division

Fee for Service

{967312É~

This package includes the following

for Division

- ☒ New Registration
- ☐ Amendment

- ☐ AD
- ☐ BPPD
- ☒ RD

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

Risk Mgr. 1

Receipt No.

S- 967312

EPA File Symbol/Reg. No.

83923-RG

Pin-Punch Date:

4/20/2015

This item is NOT subject to FFS action.

Action Code:

Parent/Child Decisions:

Requested: 2300

Granted: 2300

Amount Due: \$ 2300

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Jennifer Thomas

Date: 9/21/5

Remarks:

S: 967312 Milestone Email:

Regulatory Type: Product Registration - Section 3
Application Type: New Registration

Resubmission: Yes No
Fee For Service: Yes No
Billable: Yes No

Print Letter
Enter More Information
Tracking

Company: 83923 ENSYSTEM IV, INC

Risk Manager: Registration Division, Risk Management Team 1

Product #: 83923-RG Product Name: BITHOR XT

Override#:

Me Too Section3: 83923-2 Me Too Product Name: BITHOR SC

Application Date: 16-Apr-2015 OPP Rec'd Date: 20-Apr-2015
Front End Date: 20-Apr-2015 Risk Manager Send Date:
FFS Due Date: Negotiated Due Date:
OPP Target Date:

Receipt Content
CSF
Paper Label

View/Edit

Fast Track: New Ingredient:

Receipt Description:
NEW REGISTRATION

New Ingredient
Request Date:
New Ingredient
Received Date:

Form A Signature Date: Form B Signature Date

Leanne Pruett

From: notification@pay.gov
Sent: Friday, April 17, 2015 1:03 PM
To: Leanne Pruett
Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25KS67EO
Agency Tracking ID: 74788860321
Transaction Type: Sale
Transaction Date: 04/17/2015 01:02:49 PM EDT

Account Holder Name: Patrice Pruett, Pyxis Reg Consulting

Transaction Amount: \$1,506.00
Billing Address: 4110 136th St., NW
Billing Address 2:
City: Gig Harbor
State/Province: WA
Zip/Postal Code: 98332
Country: USA
Card Type: AmericanExpress
Card Number: *****1098

Registration Number:
Company Name: Ensystem IV, Inc.
Company Number: 83923
Action Code: R300

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Ensystex IV, Inc / 83923-XX	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Bithor XT	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St., NW, Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 83923-2 Product Name Bithor SC	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Ensystex IV is submitting an application for registration for a new product, Bithor XT. This product is identical/substantially similar to a currently registered product. Ensystex IV believes this application falls under PRIA Category R300 (44: New Product - Me-Too, Fast Track), as no new data is being submitted, and all data cited is either owned by Ensystex IV, used with permission, or no longer compensable. The fee dues, which has been paid, is \$1506 and the decision timeline is 4 months

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 quart - 55 gallon		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name P. Leanne Pruett		Title Agent	
		Telephone No. (include Area Code) 253-853-7363	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name P. Leanne Pruett		5. Date April 16, 2015	

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
83923-XX	April 16, 2015	083923-xxxxx.20150416.Bithor XT Appl for Regn.PDF

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

4-16-2015
Date

P. Leanne Pruett

Name (typed)

Agent

Title



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Ensystex IV, Inc.
2175 Village Drive
Fayetteville, NC 28304

EPA File Symbol/Registration Number

83923-xx

Product Name

Bithor XT

Date of Confidential Statement of Formula (EPA Form 8570-4)

4/16/2015

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid
Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Imidacloprid Bifenthrin		
Signature 	Name and Title P. Leanne Pruett, Authorized Agent	Date April 16, 2015

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ensystex IV, Inc.; 2175 Village Drive, Fayetteville, NC 28304; (253) 853-7369	EPA Registration Number/File Symbol 83923-xx
Active Ingredient(s) and/or representative test compound(s) Imidacloprid, Bifenthrin	Date April 16, 2015
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Nonfood, Domestic Outdoor	Product Name Bithor XT

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.


Signature 	Date 4/16/15	Typed or Printed Name and Title P. Leanne Pruett, Agent
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DATA MATRIX


Date April 16, 2015			EPA Reg No./File Symbol 83923-X		Page 1 of 4
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2175 Village Drive Fayetteville, NC 28304			Product Bithor XT		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements – Product Chemistry					
830.1550	Product Identity and Composition	46969301	Ensystex IV, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	46969301	Ensystex IV, Inc.	OWN	
830.1620	Description of Production Process				Not required ¹
830.1650	Description of Formulation Process	46969301	Ensystex IV, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	46969301	Ensystex IV, Inc.	OWN	
830.1700	Preliminary Analysis				Not required ²
830.1750	Certified Limits	46969301	Ensystex IV, Inc.	OWN	
830.1800	Enforcement Analytical Method	46969301	Ensystex IV, Inc.	OWN	
830.6302	Color				Not required ³
830.6303	Physical State	46969302	Ensystex IV, Inc.	OWN	
830.6304	Odor				Not required ³
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required ³
830.6314	Oxidation/Reduction: Chemical Incompatibility	46969302	Ensystex IV, Inc.	OWN	
830.6315	Flammability				Not required ⁴
830.6316	Explosibility				Not required ⁵
Signature 			Name and Title P. Leanne Pruett, Consultant		Date 4/16/2015

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DATA MATRIX


Date April 16, 2015			EPA Reg No./File Symbol 83923-X		Page 2 of 4
Applicant's/Registrant's Name & Address Ensyslex IV, Inc. 2175 Village Drive Fayetteville, NC 28304			Product Bithor XT		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability	47241001	Ensyslex IV, Inc.	OWN	
830.6319	Miscibility				Not required ⁶
830.6320	Corrosion Characteristics	47241001	Ensyslex IV, Inc.	OWN	
830.6321	Dielectric Breakdown Voltage				Not required ⁷
830.7000	pH	46969302	Ensyslex IV, Inc.	OWN	
830.7050	UV/Visible Absorption				Not required ³
830.7100	Viscosity	46969302	Ensyslex IV, Inc.	OWN	
830.7200	Melting Point/Melting Range				Not required ³
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density	46969302	Ensyslex IV, Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required ³
830.7520	Particle size, fiber length, diameter distribution				Not required ⁸
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required ³
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required ³
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required ³
Signature 			Name and Title P. Leanne Pruett, Consultant		Date 4/16/2015

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DATA MATRIX


Date April 16, 2015			EPA Reg No./File Symbol 83923-X		Page 3 of 4
Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2175 Village Drive Fayetteville, NC 28304			Product Bithor XT		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required ³
830.7860	Water Solubility, Generator Column Method				Not required ³
830.7950	Vapor Pressure				Not required ³
Product Specific Data Requirements – Acute Toxicity					
870.1100	Acute Oral Toxicity: Rat	49484901	Ensystem IV, Inc.	OWN	
870.1200	Acute Dermal Toxicity: Rat	49484902	Ensystem IV, Inc.	OWN	
870.1300	Acute Inhalation Toxicity: Rat	49484903	Ensystem IV, Inc.	OWN	
870.2400	Primary Eye Irritation: Rabbit	49484904	Ensystem IV, Inc.	OWN	
870.2500	Primary Dermal Irritation	49484905	Ensystem IV, Inc.	OWN	
870.2600	Dermal Sensitization	49484906	Ensystem IV, Inc.	OWN	
Product Specific Data Requirements - Efficacy					
810.3100	Soil Treatments for Imported Fire Ants	44638801	FMC Corp.	OLD	
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments	44891904 46393501	FMC Corp. FMC Corp.	OLD PER	
Signature 			Name and Title P. Leanne Pruett, Consultant		Date 4/16/2015

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DATA MATRIX

Date April 16, 2015			EPA Reg No./File Symbol 83923-X		Page 4 of 4
Applicant's/Registrant's Name & Address Ensyslex IV, Inc. 2175 Village Drive Fayetteville, NC 28304			Product Bithor XT		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
810.3500	Premises Treatments	44137401	FMC Corp.	OLD	
		44137402	FMC Corp.	OLD	
		44891903	FMC Corp.	OLD	
		44891906	FMC Corp.	OLD	
		44891907	FMC Corp.	OLD	
		44891908	FMC Corp.	OLD	
		49484907	Ensyslex IV, Inc.	OWN	
810.3600	Structural Treatments	44891903	FMC Corp.	OLD	
		44891906	FMC Corp.	OLD	
		44891907	FMC Corp.	OLD	
		44891908	FMC Corp.	OLD	
		49484907	Ensyslex IV, Inc.	OWN	
Imidacloprid and Bifenthrin Generic Data Requirements					
Ensyslex IV, Inc. qualifies for Formulator's Exemption for imidacloprid and bifenthrin generic data requirements.					
Signature 			Name and Title P. Leanne Pruett, Consultant		Date 4/16/2015

Endnotes for Data Matrix for Bithor XT

April 16, 2015

-
- ¹ **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.
- ² **830.1700** – This product does not consist solely of the technical grade active ingredient (TGA) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.
- ³ **830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
- ⁴ **830.6315** - This product is not a combustible liquid; therefore these data are not applicable to this end-use product. Please refer to the Confidential Statement of Formula for additional information on the composition of Bithor XT.
- ⁵ **830.6316** – This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Bithor XT.
- ⁶ **830.6319** – Bithor XT is a suspension concentrate formulation and not an emulsifiable concentrate. In addition, the proposed label recommends dilution of Bithor XT with water, not oil; therefore, these data are not applicable nor are these data required.
- ⁷ **830.6321** – This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these required.
- ⁸ **830.7520** - These data are not required for Bithor XT because it is not water insoluble and is not a fibrous material.

ENSYSTEX IV, Inc.

2713 Breezewood Ave., P. O. Box 87329, Fayetteville, NC 28304
Voice - 1-910-485-5720 Fax - 1-888-368-4479 www.ensystex.com

April 18, 2011

To Whom It May Concern:

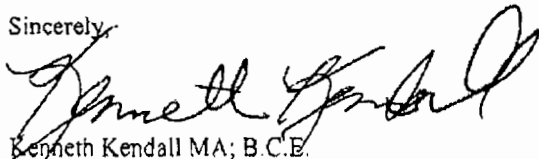
RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Ensystex IV, Inc. (EPA Company Number 83923), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Kenneth Kendall MA; B.C.E.
V.P. Technical Services & Governmental Affairs

cc: Pyxis Regulatory Consulting, Inc.

